

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LINDA J. BLOZIS,	:	
	:	
Plaintiff,	:	
	:	
v.	:	CIVIL ACTION NO. 05-891 SLR
	:	
	:	
MELLON TRUST OF DELAWARE,	:	
NATIONAL ASSOCIATION, a	:	
Pennsylvania Corporation; MELLON	:	
BANK, NATIONAL ASSOCIATION	:	
(formerly, MELLON BANK (DE)	:	
NATIONAL ASSOCIATION), a	:	
Pennsylvania Corporation; and MELLON	:	
FINANCIAL CORPORATION, a	:	
Pennsylvania Corporation,	:	
	:	

Defendants.

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

1. Are you or any of your close friends or relatives currently or formerly employed by Mellon Trust of Delaware, National Association; Mellon Bank, National Association; Mellon Bank (DE), National Association; or Mellon Financial Corporation, or any subsidiary, parent, or affiliated company of Mellon Trust of Delaware, National Association; Mellon Bank, National Association; Mellon Bank (DE), National Association; or Mellon Financial Corporation?

Yes _____ No _____

2. Are you, or a family member or close friend related to or personally acquainted with the plaintiff Linda J. Blozis?

Yes _____ No _____

3. Are you acquainted with the judge in this case?

Yes _____ No _____

4. Do you have any reason to favor or disfavor attorneys who represent plaintiffs?

Yes _____ No _____

5. Do you have any reason to favor or disfavor attorneys who represent defendants?

Yes _____ No _____

6. Have you or any of your close friends or relatives ever been a plaintiff or a defendant or any other party in a criminal or civil court proceeding?

Yes _____ No _____

7. Do you have any personal knowledge of this case, or have you read about it or heard it discussed or have any opinion regarding it?

Yes _____ No _____

8. Do you feel you can be a fair and impartial juror?

Yes _____ No _____

9. Do you have any strong feelings about lawsuits in general?

Yes _____ No _____

10. Do you believe a person who brings a lawsuit should win or lose it?

Yes _____ No _____

11. Do you believe a person who defends a lawsuit should win or lose it?

Yes _____ No _____

12. Do you believe that a lawsuit is not the proper method for resolving disputes?

Yes _____ No _____

13. Do you know of any other matter which you believe should be called to the Court's attention as having some bearing on your qualifications or ability to serve as a juror, which you think may prevent you from rendering a fair and impartial verdict based solely on the evidence presented and the Court's instructions as to the law?

Yes _____ No _____

14. Have you or any member of your family ever been a party to any other type of civil lawsuit as a plaintiff or a defendant, including a small claims suit?

Yes _____ No _____

15. Do you have any strong feelings about the justice system?

Yes _____ No _____

16. Would that experience or feeling affect your ability to fairly and impartially serve as a juror in this case?

Yes _____ No _____

17. Do you have a special disability or problem that would make it difficult or impossible for you to serve as a member of the jury in this case?

Yes _____ No _____

18. Do you believe that you have been treated unfairly by an employer because of your age or sex, or that a spouse, close friend, or relative has been treated unfairly by an employer because of age or sex?

Yes _____ No _____

19. Do you believe that you have been treated unfairly by an employer because you complained of age discrimination, or that a spouse, close friend, or relative has been treated unfairly by an employer because he or she complained of age discrimination?

Yes _____ No _____

20. Does any member of the jury believe that he or she could not be fair in deciding a claim that an employer took adverse employment action against an employee because of the employee's age or sex?

Yes _____ No _____

21. Does any member of the jury believe that he or she could not be fair in deciding a claim that an employer took adverse employment action against an employee because the employee complained of age discrimination?

Yes _____ No _____

22. Are you, a family member, or close friend related to or personally acquainted with any of the attorneys in this case: Thomas S. Neuberger, Esquire; John M. LaRosa, Esquire; Stephen J. Neuberger, Esquire; Stephanie Wilson, Esquire; or Thad Bracegirdle, Esquire?

Yes _____ No _____

23. Does any member of the jury know any of the following witnesses:

- A. Brendan Gilmore,
- B. Rosemary Thomas,
- C. Bill Becker,
- D. Gregg Landis,
- E. Maria Dunlop, or
- F. Linda Blozis?

Yes_____

No_____

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DATED: _____, 2007